

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

No. 1:16-CR-242

v.

Hon. Janet T. Neff
U.S. District Judge

LAWRENCE GERARD NASSAR,

Defendant.

_____ /

PROPOSED PROTECTIVE ORDER FOR DISCOVERY MATERIALS

For the reasons stated in the parties' Joint Motion for Protective Order,

IT IS HEREBY ORDERED pursuant to Rule 16(d) of the Federal Rules of Criminal Procedure that,

1. For purposes of this order, "sensitive discovery material" means reports or other written summaries documenting disclosures by individuals who have reported various sexual assaults or other sexual misconduct, attachments to such reports, medical records obtained by law enforcement in the course of investigating such reports, written statements prepared by individuals who have reported such sexual assaults or abuse, and other documents that disclose the name or any other information concerning a child or a person who reported being assaulted as a child.

2. Any and all "sensitive discovery material" provided by the government in this criminal case to the defendant is to be used by the defendant and counsel solely for the purpose of allowing them to prepare their defense in this case, and neither the defendant, defense counsel, nor any member of the defense team will disclose "sensitive discovery material" to anyone who is not

necessary to the preparation of the defense in the above-captioned case. This applies to all “sensitive discovery material” provided by the government in this criminal action, regardless of whether such “sensitive discovery material” has already been produced or will be produced in the future.

3. Dissemination for purposes related to defense of the criminal case is permitted to: (a) members of the defense team, i.e., counsel, co-counsel, paralegals, investigators, litigation support personnel, the defendant, and secretarial staff; (b) experts or consultants retained to assist in preparation of the defense; (c) potential witnesses interviewed by the defense team in connection with this case; and (d) the Court (including the filing and making use of exhibits) in connection with proceedings in this case.

IT IS SO ORDERED, this _____ day of _____, 2017.

HON. RAY KENT
United States Magistrate Judge